



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 21, 2003

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Starcraft RV, Inc. / 087-18157-00019

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03

Mr. Fredrick A. Davis
Starcraft RV, Inc.
P. O. Box 458
Topeka, IN 46571

October 22, 2003

Re: 087-18157
Fourth Administrative Amendment to
Part 70 087-7661-00019

Dear Mr. Davis:

Starcraft RV, Inc. was issued a Part 70 permit on August 29, 2000, for a stationary recreational vehicle manufacturing source. A letter requesting an administrative amendment was received on September 19, 2003. The changes requested changes included the following:

- (a) Operation of emission units identified as EU SB-1 and EU L-21 (renumbered as EU L-9 in Administrative Amendment No. 087-16563-00019) have been discontinued, and Starcraft RV, Inc. wants these units to be listed as "not in use" and the associated record keeping, compliance monitoring and reporting requirements be discontinued. Starcraft RV, Inc., wants to retain the ability to reactivate these units at a later time.

Response to Request:

The Office of Air Quality does not normally list units as being "not in use". Either the unit is there and available for operation or it is not there. Only in the event of the unit's removal would the record-keeping, compliance monitoring, and reporting requirements be discontinued. For the situation where the unit exists and is "not in use", the record-keeping, compliance monitoring, and reporting requirements would have to be continued. The fact that the record-keeping and reporting would mainly show zero values does not seem to place a burden on the source.

- (b) The emission unit EU-Lamination has been renovated and exhausts externally, and the the potential to emit of regulated pollutants are negligible. Therefore, Starcraft RV requested the description of this unit to be changed and the unit to be listed under insignificant activities.

Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions and **bold** to show additions):

- (1) The facility description in A.2 is amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) custom spray booth, known as EU SB-1, installed in 1995, equipped with air-assisted airless and air atomization spray applicators, equipped with dry filters for PM control, exhausted through Stack P35-A, maximum capacity to support the assembly lines.
- ~~(b) One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted in the building interior, maximum capacity to support the assembly lines.~~

- (b e) One (1) woodworking operation, known as EU W-1, equipped with a cyclone for PM in 1995, including saws, routers and milling equipment, exhausted through Stack P32-K, capacity: 2.0 tons of wood per hour.
- (d c) One (1) recreational vehicle assembly line, known as EU L-10, installed in 1993, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.
- (e d) One (1) recreation vehicle assembly line, known as EU L-9, installed in 1992, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.

(2) The description of insignificant activities is amended as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches soldering equipment, welding equipment.
- (c) Any of the following structural steel and bridge fabrication activities: cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) **One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted externally, maximum capacity to support the assembly lines.**

(3) The facility description in Section D.1 is amended as follows:

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) custom spray booth, known as EU SB-1, installed in 1995, equipped with air-assisted airless and air atomization spray applicators, equipped with dry filters for PM control, exhausted through Stack P35-A, maximum capacity to support the assembly lines.
- ~~(b) One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted in the building interior, maximum capacity to support the assembly lines.~~
- (b e) One (1) recreational vehicle assembly line, known as EU L-10, installed in 1993, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.
- (d c) One (1) recreation vehicle assembly line, known as EU L-9, installed in 1992, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations,

capacity: 4 RVs per hour.

Starcraft RV, Inc.
LaGrange, Indiana

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AA No.: 087-18157-00019

Insignificant Activities:

- (d) One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted externally, maximum capacity to support the assembly lines.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - LaGrange County
U.S. EPA, Region V
LaGrange County Health Department
Northern Regional Office
Air Compliance Section Inspector – Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Starcraft RV
1005 State Road 9, North
LaGrange, Indiana 46761**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 087-7661-00019	
Issued by: Janet McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: August 29, 2000 Expiration Date: August 29, 2005

First Administrative Amendment No.: 087-16563
Second Administrative Amendment No.: 087-17436
Third Administrative Amendment No.: 087-17916

Issuance Date: September 24, 2002
Issuance Date: July 11, 2003
Issuance Date: October 9, 2003

Fourth Administrative Amendment No.: 087-18157 Pages Modified: 5, 6, 27	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 22, 2003

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary recreational vehicle manufacturing source.

Responsible Official:	Fredrick A. Davis
Source Address:	1200 North Detroit, LaGrange, Indiana 46761
Mailing Address:	P.O. Box 453, Topeka, Indiana 46571
SIC Code:	3792
County Location:	LaGrange
County Status:	Attainment for all criteria pollutants
Source Status	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) custom spray booth, known as EU SB-1, installed in 1995, equipped with air-assisted airless and air atomization spray applicators, equipped with dry filters for PM control, exhausted through Stack P35-A, maximum capacity to support the assembly lines.
- (b) One (1) woodworking operation, known as EU W-1, equipped with a cyclone for PM control, installed in 1995, including saws, routers and milling equipment, exhausted through Stack P32-K, capacity: 2.0 tons of wood per hour.
- (c) One (1) recreational vehicle assembly line, known as EU L-10, installed in 1993, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.
- (d) One (1) recreation vehicle assembly line, known as EU L-9, installed in 1992, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches soldering equipment, welding equipment.
- (c) Any of the following structural steel and bridge fabrication activities: cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
- (d) Grinding and machining operations controller with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (e) One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted externally, maximum capacity to support the assembly lines.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) custom spray booth, known as EU SB-1, installed in 1995, equipped with air-assisted airless and air atomization spray applicators, equipped with dry filters for PM control, exhausted through Stack P35-A, maximum capacity to support the assembly lines.
- (b) One (1) recreational vehicle assembly line, known as EU L-10, installed in 1993, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.
- (c) One (1) recreation vehicle assembly line, known as EU L-9, installed in 1992, including adhesive application, solvent wipe cleaning, caulking, and touch-up painting operations, capacity: 4 RVs per hour.

Insignificant Activities:

- (d) One (1) lamination operation, known as EU Lamination, installed in 1995, exhausted externally, maximum capacity to support the assembly lines.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Pursuant to CP 087-3429-00019, issued on January 17, 1995, the VOC delivered to the applicators of the lamination booth EU Lamination shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period.
- (b) The VOC emissions delivered to the applicators of the assembly line EU L-9 shall be limited to less than twenty five (25) tons per twelve (12) consecutive month period.
- (c) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the facilities listed in (a) and/or (b) above, will make the facility subject to 326 IAC 8-1-6.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) The two assembly lines, EU L-10 and EU L-9, shall be limited to less than fifteen (15) pounds per day of VOC each, including coatings, dilution solvents, and cleaning solvents, when coating metal substrates. This usage limit makes 326 IAC 8-2-9 not applicable.
- (b) Any change or modification which may increase actual VOC usage when coating metal substrates to fifteen (15) pounds per day or more from these assembly lines will make the facilities subject to 326 IAC 8-2-9.

D.1.3 VOC Usage Limitation [326 IAC 8-2-9]

The input VOC usage in the custom spray booth, known as EU SB-1 shall be limited to less than fifteen (15) pounds per day and any change or modification which increases the VOC usage per day to fifteen (15) pounds or greater shall obtain a New Construction Permit before any such change may occur. Therefore, 326 IAC 8-2-9 does not apply.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 the PM from the assembly lines, EU L-10 and EU L-9, as well as the custom spray booth, EU SB-1, shall not exceed the pound per hour emission rate established as E in the following formula: